

## **Executive Summary:**

Lucas-Milhaupt Inc. has participated in the Wisconsin Green Tier program since September 2007. Lucas-Milhaupt manufactures brazing and soldering filler metals in the form of bulk, strip and wire, preformed strip and wire, pastes, powders, fluxes and other metal products for a wide range of industries including automotive, electronics, heating and air conditioning, aerospace and others. Lucas-Milhaupt, Inc. was founded in 1942 and employs approximately 200 people.

In 2018, Lucas-Milhaupt enjoyed continued growth due to expanded market share and economic upturn in manufacturing. Our continuous improvement projects ensure that we minimize our environmental impact and conserve natural and man-made resources through growth of the business.

## **Environmental Policy Statement:**

***Lucas-Milhaupt is committed to complying with all applicable environmental laws and regulations and to preserving the environment of the community in which we work and live by minimizing environmental risks associated with its operations. We are committed to continuous improvement of our Environmental Management System and performance including resource conservation and pollution prevention.***

## **Environmental Management System:**

Lucas-Milhaupt has had a formal Environmental Management System since 2003. Lucas Milhaupt Milwaukee is registered to ISO 14001. An annual surveillance audit was performed by BSI in May 2018, no major non-conformances were reported. There were three minor non-conformances noted in this audit, which have action plans associated with these findings.

Minor non-conformances:

### **Finding # 1 – Waste Management of Batteries**

**Describe the non-conformance needing corrective action:**

Statement of Nonconformance –

The waste management of batteries is not effectively maintained.

**OBJECTIVE EVIDENCE:**

Not all batteries in the waste bucket were taped as required per work instruction.

**INVESTIGATION:** Describe why the process/element was not being followed (ROOT CAUSE).  
Waste Management – there were several alkaline batteries not taped in the Universal waste bucket. The instructions outlined by the process were to tape all batteries. The process did not clearly define what batteries are required to be taped.

**CORRECTIVE ACTION TAKEN:**

- |  |
|--|
| 1. New process for batteries has been put in place with a visual work instruction for each type of battery. Each battery type will have the proper disposal method outlined in the work instruction. |
| 2. Training will occur for all employees at the All hands meeting in July to review the established process of battery recycling.  |

**Finding # 2 – Document control of information**

**Statement of Nonconformance :** The process for control of documented information is not fully effective.

**Objective Evidence:**

- 1) Emergency/ Contingency Plan pg 13 of 17 Appendix A Emergency Contacts (Rev 20) posted throughout the shop, but latest revision is 22. Distribution of hard copies that are posted not addressed anywhere.
- 2) No revision or distribution noted for Emergency Maps posted throughout the plant.
- 3) Operational Control documents for Significant Aspects not controlled.

**INVESTIGATION:** Describe why the process/element was not being followed (ROOT CAUSE).

LMM does not have a formal process to distribute and post EHS documents.

**CORRECTIVE ACTION TAKEN:**

1. All posting have been removed and replaced with controlled documents (rev. date and distribution # when needed)
2. A revised call list has been posted to reflect location and rev. #
3. Operational controls have been updated to reflect rev. date.
4. LMM has formalized the distribution and posting process for EHS related documents

**Finding # 3- Competency of Contractors working on behalf of Lucas-Milhaupt**

**Describe the non-conformance needing corrective action:**

Statement of Nonconformance : The process for evaluation of contractor competence is not defined.

Objective Evidence: No records of evaluation of competence for Sigma performing compliance evaluation, and Fire Suppression Sprinkler System Tester.

**INVESTIGATION:** Describe why the process/element was not being followed (ROOT CAUSE). LMM did not formally have or determine competency for contractors working on behalf of LMM. The process to determine competency of people working on behalf of LMM was informal thru knowledge or past work experience.

**CORRECTIVE ACTION TAKEN:**

1. A formal competence chart has made to track all contractors and their documented competency
2. Training will take place for maintenance and engineering to ensure that the proper documentation is on file before any work begins

## 2018 Objectives & Targets Updates:

### Target and Objective # 1 – Solvent Reduction

EHS Objective and Target Program Management																			
		Objective: LMM will review opportunities to reduce our VOC emissions thru: product replacement, usage monitoring or elimination				Monthly Check												Verification Date Task Completed	
Year: 2018		Target : Improve KPI performance																	
Savings: 5% reduction or 718 lbs of vocs		Method to Calculate Savings: 2017 VOC total - 14,353.95 lbs. - savings of 5 % or 718 lbs																	
		Method to Verify Savings: Calculation of solvent used compared to 2017 usage																	
Plan						Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec		

### Target and Objective # 2 – Flux Powder Reduction

EHS Objective and Target Program Management																					
		Objective: Flux powder is LMM's second largest waste stream. We will look at ways to reduce, reuse or modify our current processes to better utilize our powder.				Monthly Check												Verification Date Task Completed			
Year: 2018		Target : reduction of flux powder disposal - 2107 ( 27,650 lbs)																			
Savings: 2017 - 27,650 lbs - 10 % or 2,750 lbs.		Method to Calculate Savings: calculated based off 2018 actual disposal data																			
		Method to Verify Savings: calculated savings compared to 2017																			
Plan						Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec				
Task Activity Identification						Schedule															
Task No.	Identification	Task / Activity Detail	Responsibility	Start	Finish																
1	Identify objective	based on sig. aspect and impact	ehs	1/15/2018	1/15/2018	x	x	x	x	x	x	x	x	x	x	x	x	x			
2	opportunity	Envirosafe - disposal method	ehs	1/28/2018	1/30/2018	x										x	x	x	disposal method not feasible		
3	opportunity	covanta - WTE	ehs	3/11/2018	3/11/2018	x	x	x	x	x	x	x	x	x	x	x	x	x	current - WTE		
4	opportunity	QA - recycle flux	ehs	4/18/2018	ongoing				x	x								x	sample sent for testing on 4/19/18		
																			changes in machinery for better dust extraction		
5	opportunity	Aluminum dust collector efficiency change	ehs / eng.	5/18/2018	ongoing					x	x	x	x	x	x	x	x	x			
6	verification	2018 flux powder - 17,510 lbs	ehs	1/8/2018														x	reduction of 65%		

## 2019 Targets and Objectives:

Lucas Milhaupt 2019 Target and Objectives			
Year: 2019 Prepared By: Steven Koshere EVALUATION DATE: 1/4/19	Targets and Objective(s)		
Objective Title/Brief Description	Hazardous Waste	Recycling efforts	Flux Powder Reduction / Disposal
Objective Category	Environmental	Environmental	Environmental
Target Description	Hazardous Waste	Degreasing operations	Flux powder reduction - new equipment
Requires Capital/Expense? Provide Detail	non capital	non capital	capital/Expense
Objective Champion	Koshere	Koshere	Flux team
Proposed Schedule	year long	Year long	year long
GOAL Description	LMM will review opportunities to reduce our Hazardous Waste thru: product replacement, usage monitoring or elimination	LMM will decrease our degreasing operations 2019. We will review more environmental friendly degreasers	Flux powder is LMM's second largest waste stream. We will look at ways to reduce, reuse or modify our current processes to better utilize our powder.
How integrated into business process	improve KPI performance	Streamline business process to improve degreasing	improve KPI performance
Pick Objective Association	Is a Significant Aspect	Is a Significant Aspect	Is a Significant Aspect
Supports Environmental Policy Factor(s)	Yes	Yes	Yes
Considers Compliance and impact with Legal/Other Requirements	Yes	Yes	Yes
Considers impact to Prevention of Pollution	Yes	Yes	Yes
Considers impact to Incident/Accident Prevention	Yes	Yes	Yes
Considers contribution to Continual Improvement	Yes	Yes	Yes
Considers Technological Options	Yes	Yes	Yes
Considers Financial, Operational, & Business Requirements	Yes	Yes	Yes
Considers Views of Interested Parties	Yes	Yes	Yes
Identified Objective/Target is a Preventive Measure	Yes	Yes	Yes
Objective/Target is Measureable	Yes	Yes	Yes
Objective/Target Measurement Method	Compare 2018 determine % improvement. Target of 10 % reduction. Add in real amount	Compare 2018 volume and determine % improvement	disposal cost reduction / manpower reduction of handling flux powder. A targeted reduction of 15%
Objective/Target is Manageable	Yes	Yes	Yes
How Objective and Target is Communicated and tracked	Gemba board	Gemba Board	PDCA / Gemba Board
OBJECTIVE ACCEPTED? If no, briefly explain why not?	Accepted - management approved on 1/17 management review	Accepted - management approved on 1/17 management review	Accepted - management approved on 1/17 management review